

Dechert
LLP

Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

MATTHEW M. MCDONAGH

matthew.mcdonagh@dechert.com
+1 212 698 3568 Direct
+1 212 698 3599 Fax

January 28, 2021

VIA ECF

Honorable Kimba M. Wood
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *U.S. v. Lesane*, 18-cr-527 (KMW)

Dear Judge Wood:

On behalf of Defendant Steven Lesane, I respectfully write to request an adjournment of his sentencing along with the sentencing submissions deadlines. Your Honor's current Scheduling Order has the sentencing scheduled for February 24, 2021 at 11am with the Defendant's sentencing submission due by February 10, 2021 and the Government's sentencing submission due by February 17, 2021. This is the Defense's fifth request for an adjournment, and your Honor previously granted our last request on November 16, 2020.

I respectfully request an adjournment of sentencing until April 15, 2021, or a later date that is convenient for the Court, along with updated sentencing submission deadlines. It has been difficult to schedule zoom/teleconference meetings with Mr. Lesane in light of the current environment. Furthermore, it is our preference that Mr. Lesane's sentencing be held in person. While the Southern District of New York's current order prohibiting in-person meetings is set to expire on February 12, 2021, that order has been extended several times. Given the continuing uncertainty about the spread of the virus, it is certainly possible the order will be extended again. We are hopeful that, by April, as the vaccinations continue, circumstances will be much improved.

I have conferred with the Government and they consent to this adjournment. Thank for your time and attention to this matter.

Respectfully submitted,

/s/ Matthew M. McDonagh
Matthew M. McDonagh

Sentencing is adjourned +
May 10, 2021, at 11:00 a.m. Defendant's
submission is due by April 26.
Government submission is due by
May 3.

Kimba M. Wood 1/29/21
SO ORDERED